

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF NEW YORK

In re:

The Diocese of Rochester,
Debtor.

Case No. 19-20905

Chapter 11

The Diocese of Rochester,
Plaintiff,

Adversary Proceeding
No.: 19-ap-02021

v.

The Continental Insurance Company, Certain Underwriters at Lloyd's, London, Certain London Market Companies, The Dominion Insurance Company Limited, Stronghold Insurance Company Limited, CX Reinsurance Company Limited, Markel International Insurance Company Limited, Tenecom Limited, National Surety Corporation, Interstate Fire & Casualty Company, Colonial Penn Insurance Company, and HDI Global Specialty SE,

Defendants.

JOINDER OF CERTAIN SEXUAL ABUSE CLAIMANTS IN OFFICIAL COMMITTEE OF UNSECURED CREDITORS' OBJECTION TO DEBTOR'S MOTION FOR ENTRY OF AN ORDER APPROVING SETTLEMENT AGREEMENT WITH CERTAIN UNDERWRITERS AT LLOYD'S, LONDON, CERTAIN LONDON MARKET COMPANIES, INTERSTATE FIRE & CASUALTY COMPANY AND NATIONAL SURETY CORPORATION

Certain Sexual Abuse Claimants, by and through their undersigned counsel, hereby submit this joinder to the *Official Committee of Unsecured Creditors' Objection to Debtor's Motion for Entry of an Order Approving Settlement Agreement with Certain Underwriters at Lloyd's, London,*

Certain London Market Companies, Interstate Fire & Casualty Company and National Surety Corporation [Adv. Pro. Docket No. 136] (the “**Objection**”)¹ and respectfully states as follows:

JOINDER

1. The undersigned counsel represents ninety-six individuals who filed Sexual Abuse Claims against the Diocese (collectively, the “**Claimants**”). The Claimants hereby join in and adopt the arguments set forth the Objection, which is incorporated herein by reference for all purposes.

2. The Claimants believe that the settlement amount with LMI\Interstate is too low. Moreover, the Claimants cannot support a Settlement Agreement that provides for extensive releases of Non-Diocesan Entities without disclosing the amount of contributions by such parties to a global settlement. The Claimants ask the Court to prevent a manifest injustice and deny the 9019 Motion.

Dated: July 7, 2021

Respectfully submitted,

By: /s/Mitchell Garabedian
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¹ Capitalized terms used but not defined herein shall have the meanings and definitions ascribed to them in the Objection.